

Case No.:MO:24-CV-317 MIDALND-ODESSA DIVISION

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
MIDLAND-ODESSA DIVISION**

CONTIQUE WILLCOT,

Plaintiff,

vs.

SECURITIES AND EXCHANGE
COMMISSION, ET AL.,

Defendant

Case No.: MO:24-CV-317

**NOTICE OF SUPPLEMENTAL
INFORMATION**

Plaintiff Contique Willcot, pro se, respectfully submits this notice to supplement his Motion to Lift PSLRA Stay [Docket No. 32, filed April 23, 2025] with specific exhibit page citations, inadvertently omitted, and to address a false claim by defendants' former counsel, James W. Christian, that Plaintiff's lawsuit is part of a coordinated effort to harm the Meta Materials, Inc. bankruptcy estate. Attached as Exhibit 1 is Christian's declaration for the Court's reference. This ensures a clear record for the Court's consideration.

1. Exhibit Page Citations To enhance clarity, Plaintiff provides page references for exhibits cited in the motion (Docket No. 32):
 - Page 2, Paragraph 1: Exhibit W (TD Ameritrade, NBH shares), page 1 of 5.
 - Page 2, Paragraph 2: Exhibit A (FINRA Threshold List), pages 1–3 of 10; Exhibit S (GTS MMTLP orders), page 1 of 3; Exhibit AA (SEC v. Brda), pages 7–11 of 46.
 - Page 2, Paragraph 3: Exhibit U (Vermont preservation order), page 1 of 5.

- Page 2, Paragraph 4: Exhibit V (Fidelity statements), pages 1–2 of 10; Exhibit E (TRCH-MMAT merger), page 1 of 5; Exhibit AA, pages 7–11 of 46; Exhibit S, page 1 of 3.
- Page 2, Paragraph 5: Exhibit V, pages 1–2 of 10; Exhibit W, page 1 of 5; Exhibit AA, page 32 of 46.
- Page 3, Paragraph 1: Exhibit A, page 9 of 10; Exhibit W, page 1 of 5.
- Page 3, Paragraph 2: Exhibit A, pages 1–3 of 10.
- Page 3, Paragraph 3: Exhibit H (FINRA Rule 10b-17 violation), page 1 of 3; Exhibit M (NBH prospectus), page 1 of 5; Exhibit W, page 1 of 5.
- Page 4, Paragraph 1: Exhibit V, pages 1–2 of 10; Exhibit W, page 1 of 5; Exhibit B (NWBO v. GTS), pages 1–2 of 15; Exhibit K (Rubenstein testimony), page 1 of 5; Exhibit S, page 1 of 3.
- Page 4, Paragraph 2: Exhibit A, pages 1–3 of 10; Exhibit J (FINRA Rule 4320), page 1 of 3; Exhibit H, page 1 of 3; Exhibit M, page 1 of 5.
- Page 4, Paragraph 3: Exhibit AA, pages 7–11 of 46; Exhibit AD (SEC complaints), page 1 of 5; Exhibit G (congressional demands), page 1 of 5; Exhibit AB (Wells Notice), page 1 of 3; Exhibit N (Alpine v. FINRA), page 1 of 10; Exhibit Q (Rolo v. SEC), page 4 of 10.
- Page 5, Paragraph 1: Exhibit U, page 1 of 5; Exhibit AC (TDDS logs), page 1 of 3; Exhibit A, pages 1–3, 9 of 10.
- Page 5, Paragraph 2: Exhibit N, page 1 of 10; Exhibit J, page 1 of 3; Exhibit H, page 1 of 3; Exhibit B, pages 1–2 of 15; Exhibit K, page 1 of 5; Exhibit S, page 1

of 3; Exhibit AA, pages 7–11 of 46; Exhibit AD, page 1 of 5; Exhibit Q, page 4 of 10.

- Page 11, Paragraph 1: Exhibit Q, page 4 of 10; Exhibit V, pages 1–2 of 10; Exhibit W, page 1 of 5.
- Page 11, Paragraph 2: Exhibit AA, pages 7–11, 32 of 46; Exhibit I (Draddy & Boyl emails), pages 1–2 of 4; Exhibit S, page 1 of 3; Exhibit D (unreported shorts), page 1 of 3; Exhibit B, pages 1–2 of 15; Exhibit Q, page 4 of 10.
- Page 11, Paragraph 3: Exhibit A, page 9 of 10; Exhibit E, page 1 of 5; Exhibit G, page 1 of 5; Exhibit K, page 1 of 5; Exhibit Q, page 4 of 10; Exhibit D, page 1 of 3; Exhibit I, pages 1–2 of 4. Plaintiff apologizes for omitting these citations and submits them to assist the Court and parties.

2. Response to Christian’s False Claim In an unrelated bankruptcy case, In re Meta Materials Inc., Case No. 24-50792-hlb (D. Nev., Doc 1878, filed April 23, 2025, attached as Exhibit 1), James W. Christian, former counsel for defendant Next Bridge Hydrocarbons, Inc., falsely claimed Plaintiff’s lawsuit is part of a “coordinated effort to obstruct” the Meta Materials bankruptcy estate (Exhibit 1, ¶¶ 7–8). This claim is baseless:
 - Plaintiff has never referenced the Meta Materials bankruptcy or Mr. Christian in this lawsuit or any communications, proving this action is an independent effort to seek justice for MMTLP securities fraud, as shown by Exhibit V, pages 1–2 (investment losses), and Exhibit A, pages 1–3 (market manipulation).
 - As a pro se Fire Lieutenant, Plaintiff filed this lawsuit alone to recover a \$30,000+ loss caused by defendants’ actions (Exhibit W, page 1). While Plaintiff is friends with plaintiffs in Spears v. Next Bridge (Case No. 7:24-cv-321-DC-RCG) and

Pease v. SEC (Case No. 7:24-cv-322) and shares information, this lawsuit is solely Plaintiff's, with no coordination in filing or strategy.

- Christian provides no evidence of coordination, and his April 16, 2025, letter (Exhibit D in Doc 1878, not attached) is not before this Court, making his claim speculative.
- Christian's withdrawal from representing Next Bridge (Exhibit 1, ¶ 9) suggests his claim was a tactic to deflect scrutiny of his potential conflict, as he also represented the Meta Materials trustee, raising impartiality concerns under 11 U.S.C. § 327(a).

3. Plaintiff's Independent Purpose This lawsuit seeks to lift the PSLRA stay to access Blue Sheets, uncovering defendants' alleged MMTLP fraud (Exhibit AA, pages 7–11; Exhibit S, page 1). It targets the SEC, FINRA, GTS Securities, Next Bridge, and others for justice in Plaintiff's personal losses, not the Meta Materials bankruptcy estate, and is unrelated to Case 24-50792-hlb.

Plaintiff requests the Court disregard Christian's unfounded claim and accept this supplement to clarify exhibit citations and Plaintiff's intent. Plaintiff is available for further clarification.

Respectfully submitted,

/s/ Contique Willcot Pro Se Plaintiff

6940 SW 10th Ct,

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Phone: (954) 274-5173

Case No.:MO:24-CV-317 MIDALND-ODESSA DIVISION

Email: contiq9@yahoo.com

Date: April 28, 2025

Certificate of Service I certify that on April 28, 2025, I served this notice and attached Exhibit 1 via CM/ECF on counsel for Defendants Securities and Exchange Commission (100 F St NE, Washington, DC 20549), Financial Industry Regulatory Authority (1735 K St NW, Washington, DC 20006), GTS Securities (545 Madison Ave, New York, NY 10022), Next Bridge Hydrocarbons, Inc. (1360 Post Oak Blvd, Suite 2400, Houston, TX 77056), John Brda, and other defendants per the docket, and by U.S. mail to any non-registered parties, per Fed. R. Civ. P. 5 and Local Rule CV-7(c). /s/ Contique Willcot

Exhibit 1: Declaration of James W. Christian, In re Meta Materials Inc., Case No. 24-50792-hlb, Doc 1878 (D. Nev., filed April 23, 2025).